

Jehoaddan Wilson  
Reg. # 24085-111  
FCI Victorville Medium 1  
P. O. Box 5300  
Adelanto, CA 92301  
Class Member

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NORTH DISTRICT OF CALIFORNIA  
OAKLAND OFFICE  
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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND

California Coalition for  
Women Prisoners et. al.

v.

United States of America  
Federal Bureau of Prisons  
et.al.

Case No:  
4:23-cv-04155-YGR (N.D.Cal.)

OBJECTION TO PROPOSED  
NOTICE OF SETTLEMENT

OBJECTION TO PROPOSED NOTICE OF SETTLEMENT.

I, JETHOADDAN WILSON, Class member in this instant case, am writing to object to the proposed notice of Settlement for some of the foregoing reasons:

1. SETTLEMENT LACKS CLEAR ATTACHED EXHIBITS OR CITED REFERENCES OF LEGAL AUTHORIZATIONS TO CARRY THROUGH ALL PROPOSED CHANGES, IMPROVEMENTS, CONDITIONS, AND ACTIONS BY THE B.O. P.

A.) The Settlement lacks clear attached exhibits or cited references of legal authorizations to carry through proposed changes, improvements, conditions, and actions by the Bureau of Prisons ("B.O.P."). The Settlement lacks clear exhibits of congressional law for the First Step Act ("FSA") and the Second Chance Act of 2007 ("SCA"). The proposal must obviate duplicitous and equivocating interpretations that allow room for plain error, in which it does not. Authorities such as Pub. L. No. 110-199, 122 Stat. 657 (2008), 28 CFR §§ 570.20 - 570.22 should be prevalent.

B.) The paragraph on page 4, line 14-19, if not corrected, is unreasonable and misconstrued because it does not coincide with the actuality of the law for each act nor does the settlement express or imply that it does. This oversight may cause a substantial entitlement issue which later may question why was FSA or SCA applied incorrectly or not at all. This inadvertence will result in false imprisonment through appeals for plain error.

1.) In paragraph L of line 16, the statement, "First Step Act or the Second Chance Act" is a conditional statement that translates, not authorize, that either only FSA or the SCA and not both FSA and SCA can apply to the

Sentence. Applying only one or the other may lead to AIC staying in prison longer than the actual law permits or the AIC may not receive neither Act due to the non-existent references of authority. How can the court of law order something without cited authority to do so?

For instance, "FSA or SCA" translate the following logical conditions in paragraph L, line 16:

- I. Only FSA can apply to AIC and not SCA.
- II. Only SCA can apply to AIC and not FSA  
[some AIC may not be eligible due to the type of crime].
- III. Not Both FSA and SCA [even if AIC is eligible for both].

Paragraph L should be revised because it's contradictory or inconsistent with the attached exhibit 1. To meet the conditions and be consistent, the issue of Community Placement should unequivocally state that one Act or the other Act or both Acts may apply to the Sentence of AIC. For line 16 of paragraph L Should read like this :

"First Step Act AND the Second Chance Act"  
to include either Acts or both if eligible. The revised settlement terms will satiate all parties in the above suit.

My experience caused me to see the egregious errors in this proposal. One experience, I was sexually assaulted by a male B.O.P. Correctional officer on 4/7/2024. To date I have been sexually assaulted and or abused an average of once per month in the two years and nine months of current imprisonment.

On or around December 10, 2024, B.O.P. Case Manager Mrs. J. Blackford ("Mrs. J.B.") stated verbally that [she] will be giving me the SCA. Unbeknownst to me during our meeting, Mrs. J.B. used my FSA credits as the SCA placement days instead of calculating my FSA in addition to the SCA pursuant to 18 USC § 3624(1) or (2). Mrs. J.B. statement was contradictory to the assessment information date 10/15/2024 on exhibit 1 attached.

This experience clearly demonstrates how egregious the B.O.P. can equivocate the law. That's why I am requesting that proposal be more specific. Counsel should effectively assist in the matter per the Sixth Amendment. To obviate repetitiveness, counsel should include the condition that FSA AND SCA must be applied to AIC sentence if AIC is eligible for both. As stated in title 18 of the United States Code, the B.O.P. Warden must obtain B.O.P. Regional Director's approval for RRC through SCA not Mrs. J.B.

2. AIC WITH SEXUAL ABUSE HISTORY SHOULD NOT BE TRANSFERRED OR GIVEN RRC OR HALF-WAY HOUSE DUE TO REPETITIONS DANGER AND THREAT.

AIC with sexual abuse history should not be transferred or given half-way house (RRC), instead AIC with sexual abuse history should be granted Home confinement with FSA and SCA or Home Detention if not eligible for FSA and SCA, and if AIC has a residence (home). The authority under the SCA and U.S. Sentencing Guidelines ("USSG") is pursuant to 18 U.S.C. §§ 3624(g), 3624 (c)(2), USSG § 5F1 and § 3621(b)(3).

The B.O.P. is refusing to send me on Home confinement for community placement. By placing me in a half-way house, when I have my own residence, the B.O.P. is putting me in more danger of being sexually assaulted and abused again if I'm not granted Home confinement and/or home detention which my residence would be adequate.

3. CONDITIONAL PLACEMENT DAYS SHOULD BE APPLIED TO AIC FSA AND SCA.

The Settlement is lacking consideration for applying AIC conditional placement days for FSA and SCA. Conditional placement days must be

calculated into the AIC FSA and SCA calculations because AIC will not benefit from FSA and SCA placement days once transferred into Community placement therefore AIC will lose future time credits that would have been earned and would have been applied in the future toward community custody [placement] period. See Exhibit 1 (attached)

### CONCLUSION

I request that this court consider the reasons for objection herein and not order the settlement until the corrections are prevalent.

Respectfully Submitted,

Jehoaddan Wilson

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Reg. # 24085-111

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P.O. Box 5300

Adelanto, CA 92301

Class Member

Dated: February 7, 2025

FCI Victorville Med. I

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Adelanto, CA 92301

CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that I have served a copy of this foregoing instrument upon the Clerk of the Court, via properly addressed U.S. Mail, with first-class postage affixed thereto, by placing into the internal mailing system as made available to inmates for legal mail, at the Federal correctional institution, Victorville. The movant further request that a copy of this objection motion be forwarded to all interested parties via the CM/ECF system, as she is detained, indigent, and has no other means.

Done This 7<sup>th</sup> day of February, 2025

Respectfully Submitted,

Jehoaddan Wilson

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P.O. Box 5300

Adelanto, CA 92301

## FSA Time Credit Assessment

Register Number: 24085-111, Last Name: WILSON

U.S. DEPARTMENT OF JUSTICE

FEDERAL BUREAU OF PRISONS

Exhibit 1

--- Best Case Scenario - Conditional Pre-release Planning &amp; Preparation Only -----

All conditional days and conditional dates below are the individual's best case scenario given the individual's FSA/FTC status and best case SCA days as of 10-15-2024. These dates can change if there are changes to one or more of the following: the individual's FSA risk, FSA opt-in/opt-out status, or best case SCA days.

SCA DAYS ARE NOT GUARANTEED AND REQUIRE AN INDIVIDUALIZED ASSESSMENT! THEREFORE, IF A DEFAULT OF 365 DAYS IS REFLECTED, THIS DATE IS SUBJECT TO CHANGE BASED ON THE REQUIRED FIVE-FACTOR REVIEW UNDER 18 USC SEC. 3621(B). AN INDIVIDUAL WHO HAS PENDING CHARGES/DETAINERS ARE NOT ELIGIBLE FOR SCA TIME. THE FIVE-FACTOR REVIEW INVOLVES THE FOLLOWING: (1) THE RESOURCES OF THE FACILITY CONTEMPLATED; (2) THE NATURE AND CIRCUMSTANCES OF THE OFFENSE; (3) THE HISTORY AND CHARACTERISTICS OF THE PRISONER; (4) ANY STATEMENT BY THE COURT THAT IMPOSED THE SENTENCE: (a) CONCERNING THE PURPOSES FOR WHICH THE SENTENCE TO IMPRISONMENT WAS DETERMINED TO BE WARRANTED; OR (b) RECOMMENDING A TYPE OF PENAL OR CORRECTIONAL FACILITY AS APPROPRIATE; AND (5) ANY PERTINENT POLICY STATEMENT ISSUED BY THE U.S. SENTENCING COMMISSION.

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Projected Release Date: 03-04-2028

Projected Release Method: GCT REL

FSA Projected Release Date: 03-10-2027

FSA Projected Release Method: FSA REL

FSA Conditional Release Date: 03-05-2027

SCA Conditional Placement Days: 365\*

SCA Conditional Placement Date: 03-05-2026\* - 285

FSA Conditional Placement Days: 285 - 9 mos / 15 days

FSA Conditional Placement Date: 05-24-2026

SCA Conditional Transition To Community Date: 5/24/2025

\*Default SCA conditional placement days. This requires a five-factor review!

$$\begin{aligned}
 & \text{1 yr} & 12 - 9^{mo} = 3 \text{mos} \\
 & 3/5/25 + 3^{mo} & \Rightarrow 6/5/25 \\
 & - 150 \text{days} & 5/20/25
 \end{aligned}$$

p.s. I redacted it because I was praying that I would be released sooner. Truthfully it states "5/24/2025."



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Clerk of the Court      Court  
United States District      of California  
Northern District      400 S.  
1301 Clay Street,  
Oakland, CA 94612

682 222 222 222

